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December 18, 2012

BY ECFS

Ms. Marlene Dortch Secretary Federal Communications Commission 445 – 12th Street, SW Washington, D.C. 20554

> Re: In the Matter of Expanding the Economic and Innovation Opportunities of Spectrum Through Incentive Auctions, GN Docket No. 12-268 Notice of Oral Ex Parte Communication

Dear Ms. Dortch:

On Friday, December 14, 2012, William deKay and Ravi Potharlanka of LocusPoint Networks, LLC ("LocusPoint"), along with Jonathan Cohen and the undersigned (LocusPoint's counsel), met with the following Commission staff regarding the above-referenced proceeding:

- Gary Epstein, Senior Advisor and Chair of Incentive Auctions Task Force, Office of Strategic Planning and Policy Analysis
- Edward Smith, Special Counsel, Enforcement Bureau
- Alan Stillwell, Deputy Chief, Office of Engineering and Technology
- Brett Tarnutzer, Program/Project Manager, Wireless Telecommunications Bureau
- Barbara Kreisman, Chief, Video Division, Media Bureau
- David Brown, Associate Division Chief, Video Division, Media Bureau
- Rebecca Hanson, Senior Advisor, Broadband Spectrum, Media Bureau

LocusPoint requested this meeting in order for it to better understand the issues raised in the above-referenced docket as it formulates policy positions. In the meeting, LocusPoint discussed with Commission staff policy issues surrounding the incentives for broadcaster participation in the reverse auction (including valuation questions and ongoing U.S. government discussions with Canada and Mexico regarding cross-border interference concerns), auction design issues (including the descending clock approach, scoring, and package bidding), and Class A television station eligibility issues (including Class A digital transition matters and the status of pending Class A compliance inquiries). Also discussed were questions regarding the

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transparency and simplicity of the incentive auction process. LocusPoint did not advocate any particular approach to these matters in the meeting.

Please direct any questions to the undersigned.

Respectfully submitted,

Rosemary C. Harold

Counsel for LocusPoint Networks, LLC

cc: Gary Epstein
Edward Smith
Alan Stillwell
Brett Tarnutzer
Barbara Kreisman
David Brown

Rebecca Hanson